

**REMARKS/ARGUMENTS**

Claims 8, 10-14 and 17-33 stand in the present application, claim 27 having been rewritten in independent form. Applicants note with appreciation the Examiner's allowance of claims 8, 10-14, 17-23 and 30-33 and the indication of allowable subject matter in claim 27, but respectfully submit that in view of the above amendments and the following remarks that all of the claims standing in this case are in condition for allowance. Accordingly, reconsideration and favorable action is respectfully requested.

As noted above, Applicants have rewritten claim 27 in independent form. Since the Examiner indicated that claim 27 contained allowable subject matter, claim 27 is now believed to be in condition for allowance.

In the Office Action, the Examiner has rejected claims 24-26 and 28 under 35 U.S.C. § 102(e) as being anticipated by Heinz and has rejected claim 29 under 35 U.S.C. § 103(a) as being unpatentable over Heinz in view of Inoue. Applicants respectfully traverse the Examiner's §§ 102 and 103 rejections of these claims.

Applicants respectfully submit that the structure recited in independent claim 24 patentably distinguishes over that disclosed in Heinz. Heinz discloses piezoelectric device 2 extending in parallel to bellows 48. More specifically, piezoelectric device 2 is disposed within bellows 48. The Heinz structure is disadvantageous in that the diameter of bellows 48 needs to be increased to accommodate piezoelectric device 2, which renders the Heinz structure unsuitable for installation in small-sized housings of fuel injectors. Decreasing the overall size of the Heinz structure would require

decreasing the size of piezoelectric device 2 itself, thus resulting in decreased drivability of the piezoelectric device.

In contrast, Applicants' structure, as shown in Figs. 9 and 10, has bellows 14 (i.e., extensible member recited in claim 24) arrayed apart from piezoelectric device 61 (i.e., the electrically deformable member recited in claim 24) in a direction of expansion and contraction of piezoelectric device 61. More specifically, bellows 14 is disposed adjacent piezoelectric device 61 in the direction of expansion and contraction of piezoelectric device 61. In other words, bellows 14 is not arranged outside of piezoelectric device 61, as is the Heinz device. This different arrangement is advantageous in that it eliminates the above described problem associated with the Heinz structure.

Accordingly, since Heinz does not teach or suggest the structure recited in independent claim 24, claim 24 and its respective dependent claims 25, 26, 28 and 29 are believed to patentably define over the cited references taken either singly or in combination.

Therefore, in view of the above amendments and remarks, it is respectfully requested that the application be reconsidered and that all of claims 8, 10-14 and 17-33, standing in the application, be allowed and that the case be passed to issue. If there are any other issues remaining which the Examiner believes could be resolved through either a Supplemental Response or an Examiner's Amendment, the Examiner is

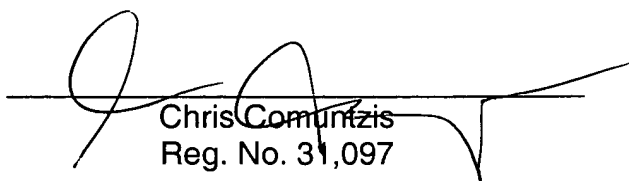
KATSURA et al  
Appl. No. 09/887,562  
May 4, 2004

respectfully requested to contact the undersigned at the local telephone exchange  
indicated below.

Respectfully submitted,

**NIXON & VANDERHYE P.C.**

By: \_\_\_\_\_

  
Chris Comuntzis  
Reg. No. 31,097

CC:Imr  
1100 North Glebe Road, 8th Floor  
Arlington, VA 22201-4714  
Telephone: (703) 816-4000  
Facsimile: (703) 816-4100